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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

**STATEMENT OF THE RAYMOND SACKLER FAMILY IN RESPECT OF THE
SECOND MOTION TO UNSEAL JUDICIAL RECORDS BY MEDIA
INTERVENORS DOW JONES & COMPANY, INC., BOSTON GLOBE MEDIA
PARTNERS, LLC, AND REUTERS NEWS & MEDIA, INC.**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

The Raymond Sackler family,² by and through its undersigned counsel, respectfully submits this statement in respect of the *Second Motion to Unseal Judicial Records by Media Intervenors Dow Jones & Company, Inc., Boston Globe Media Partners, LLC, and Reuters News & Media, Inc.* [ECF No. 2188] (the “Second Motion to Unseal”),³ incorporates by reference in full its statement in respect of the *Motion to Intervene and Unseal Judicial Records by Dow Jones & Company, Inc., Boston Globe Media Partners, LLC, and Reuters News & Media, Inc.* [ECF No. 2022] (the “First Motion to Unseal”), and additionally states as follows:

STATEMENT

1. As set forth in its statement concerning the First Motion to Unseal [ECF No. 2132], the Raymond Sackler family supports the public disclosure of documents submitted in connection with the Motions to Compel, subject to narrow protections consistent with established law and previous orders of this Court.

2. In making the Second Motion to Unseal, it appears that the Media Intervenors seek only to ensure that surreply briefs and accompanying materials related to the Motions to Compel, to the extent submitted after the First Motion to Unseal was filed, are included in their request for unsealing relief. The Raymond Sackler family does not object to this (subject to its reservation of rights to apply limited redactions); to the contrary, the support it expressed in its original statement extended to the surreplies and related materials.

3. In accordance with the Court’s instructions, the Raymond Sackler family met and conferred in good faith with the other parties and joined a stipulation governing the disclosure of documents submitted in connection with the Motions to Compel [ECF No. 2136]. That stipulation

² The Raymond Sackler family includes Richard Sackler, David Sackler, and the estates of the late Jonathan Sackler and Beverly Sackler.

³ Capitalized terms not defined herein have the same meaning as in the Second Motion to Unseal.

lays out a schedule by which surreply materials would be publicly filed. Many were filed on December 18, 2020, including the families' surreply briefs and portions of presentations they had made to other parties in interest early in these cases. The balance of the surreply materials was publicly filed on January 11, 2021.

CONCLUSION

4. The Raymond Sackler family respectfully requests that any order granting the Second Motion to Unseal provide that the Raymond Sackler family is authorized to redact public versions of unsealed documents to protect the limited classes of information described in its statement in response to the First Motion to Unseal, and that the Court grant the Raymond Sackler family such other relief as is just and proper.

Dated: January 13, 2021
New York, New York

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